

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	CHAPTER 11
	§	
KRISJENN RANCH, LLC, <i>et al</i>	§	CASE NO. 20-50805-rbk
	§	
	§	
DEBTOR	§	(Jointly Administered)

**MOTION REQUESTING EXPEDITED CONSIDERATION OF DEBTORS'
MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT
PURSUANT TO BANKRUPTCY RULE 9019(A)**

**DEBTORS HAVE REQUESTED EXPEDITED CONSIDERATION OF THIS MOTION
AND HAVE REQUESTED THAT A HEARING BE HELD ON THIS MOTION AT THE
COURT'S EARLIEST CONVENIENCE. IF THE COURT IN FACT SETS THIS
MOTION FOR AN EXPEDITED HEARING, THEN ONLY ATTENDANCE AT THE
HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

KrisJenn Ranch, LLC, KrisJenn Ranch, LLC Series Pipeline ROW, and KrisJenn Ranch, LLC Series Uvalde Ranch's (the "Debtors"), Debtors and Debtors-in-Possession submit this Motion Requesting Expedited Consideration of Debtors' Motion for Approval of Settlement Agreement under Rule 9019(a) (the "Motion"), and in support thereof respectfully shows the Court as follows:

BACKGROUND

1. The final major issue in the Debtors' bankruptcy cases is the amount of attorney fees and interest owed their primary secured creditor McLeod Oil. The Parties have reached a settlement that allows Debtors to pay all of its allowed creditors in full and are seeking court approval of the Settlement Agreement.

RELIEF REQUESTED

2. Debtors request the court set an expedited hearing on Debtors' Motion for Approval of Settlement Agreement under Rule 9019(a).

PRAYER

WHEREFORE, premises considered, Debtors respectfully request that the Court grant this request and set the Motion for Approval of Settlement Agreement under Rule 9019(a) to be heard at the Court's earliest convenience.

Dated: February 9, 2022

Respectfully submitted,

Submitted By:
SMEBERG LAW FIRM, PLLC

By: /s/ Ronald J. Smeberg
RONALD J. SMEBERG
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ATTORNEY FOR DEBTOR

CERTIFICATE OF CONFERENCE

I hereby certify that on February 9, 2022, I conferred via electronic mail with bankruptcy counsel for Mcleod Oil. Counsel for McLeod is unopposed to expediting the motion.

/s/ Ronald J. Smeberg
RONALD J. SMEBERG

CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2022, true and correct copies of the foregoing will be forwarded electronically via the Court's ECF System, or by U.S. first class mail, postage prepaid, on, all parties listed on the attached Service List.

/s/ Ronald J. Smeberg
RONALD J. SMEBERG

SERVICE LIST

DEBTOR

KrissJenn Ranch, LLC
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Mc Queeney, TX 78123-3418

GOVERNMENT ENTITIES

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San Antonio, TX 78295-1539

U.S. Attorney
Attn: Bkcy Division
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San Antonio, Texas 78216

Internal Revenue Services
Special Procedures Branch
300 E. 8th St. STOP 5026 AUS
Austin, TX 78701

Texas Comptroller of Public Account
Attn: Bankruptcy
P.O. Box 149359
Austin, TX 78714-9359

Angelina County Tax Assessor
606 E Lufkin Ave,
Lufkin, Texas 75901

Nacogdoches County Tax
Assessor Collector
101 West Main Street
Nacogdoches, Texas 75961

Rusk County
202 N Main St,
Henderson, Texas 75652

Shelby County, Tax Collector
200 St. Augustine St.
Center, Texas 75935

Tenaha ISD Tax Assessor-Collector
138 College St
Tenaha, TX 75974-5612

Uvalde Tax Assessor
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Uvalde, Texas 78801

NOTICE PARTIES

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SECURED CREDITORS

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UNSECURED CREDITORS

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Medina's Pest Control
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Uvalde, TX 78801-7625

Texas Farm Store
236 E Nopal St
Uvalde, TX 78801-5317

Uvalco Supply
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Uvalde, TX 78801-4940

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Seneca, SC 29678